



2100 SouthBridge Parkway  
Suite 650  
Birmingham, AL 35209

One US Bank Plaza  
St. Louis, MO 63101

314 552 6000 main  
314 552 7000 fax  
thompsoncoburn.com

**Brandt P. Hill**  
805.451.4792  
[bhill@thompsoncoburn.com](mailto:bhill@thompsoncoburn.com)

October 17, 2024

**VIA ECF & EMAIL**

Hon. P. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007  
[Failla\\_NYSDChambers@nysd.uscourts.gov](mailto:Failla_NYSDChambers@nysd.uscourts.gov)

**MEMO ENDORSED**

**RE: Chi Zhang v. Touro College, et al., Case No. 1:24-cv-06215-KPF**

Dear Judge Failla:

Plaintiff Chi Zhang and Defendants Touro College, Touro College of Osteopathic Medicine, and Touro University respectfully jointly request an adjournment of the initial pretrial conference (“IPTC”) currently scheduled before the Court on October 25, 2024. Doc. 7. The Court has scheduled a conference on Plaintiff’s request to file a motion to remand for October 31, 2024. Doc. 12. In light of the threshold issues raised by Plaintiff’s request for permission to file a motion to remand, the parties request that the Court adjourn the IPTC and the associated requirement to submit a proposed Case Management Plan and joint letter in advance of the IPTC.

Respectfully submitted,

Brandt Hill

Thompson Coburn LLP

cc: Stewart Lee Karlin  
Natalia Kapitonova  
Stewart Lee Karlin Law Group, P.C.  
111 John Street, 22nd Floor  
New York, NY 10038  
[slk@stewartkarlin.com](mailto:slk@stewartkarlin.com)  
[cnk@stewartkarlin.com](mailto:cnk@stewartkarlin.com)

*Attorneys for Plaintiff*

Application GRANTED. The initial pretrial conference scheduled for October 25, 2024, and all associated deadlines, are hereby ADJOURNED *sine die*, pending further order from the Court.

The Clerk of Court is directed to terminate the pending motion at docket entry 14.

Dated: October 17, 2024  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE